

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

February 24, 2006

John R. Barnes, Treasurer
Raytheon Company Political Action Committee
1100 Wilson Boulevard, Suite 1500
Arlington, VA 22209

Identification Number:

C00097568

Response Due Date: March 27, 2006

Reference:

Year End Report (12/1/05-12/31/05)

Dear Mr. Barnes:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:

-Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §§110.1(d) and 110.2(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-The totals listed on Lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. When an individual's aggregate exceeds the \$200 threshold, the amount should not be deducted from the Column B figure for Line 11(a)(ii). Please amend your report and any subsequent reports that may be affected by this correction.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

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RAYTHEON COMPANY POLITICAL ACTION COMMITTEE Page 3

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1152.

Sincerely,

Rosa G. Lewis

Campaign Finance Analyst

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Reports Analysis Division

220

Contributor Name	Date	Amount	Report
W. T. Carey	1/14/2005	\$380.00	2005 February Monthly
W. T. Carey	2/11/2005	\$380.00	2005 March Monthly
W. Carey	3/10/2005	\$380.00	2005 April Monthly
W. Carey	4/10/2005	\$570.00	2005 May Monthly
W. Carey	4/30/2005	\$380.00	2005 May Monthly
W. Carey	5/12/2005	\$190.00	2005 June Monthly
W. Carey	5/26/2005	\$190.00	2005 June Monthly
W. Carey	6/9/2005	\$190.00	2005 July Monthly
W. Carey	6/23/2005	\$190.00	2005 July Monthly
W. Carey	7/7/2005	\$190.00	2005 August Monthly
W. Carey	7/21/2005	\$190.00	2005 August Monthly
W. Carey	8/4/2005	\$190.00	2005 September Monthly
W. Carey	8/18/2005	\$190.00	2005 September Monthly
W. Carey	9/1/2005	\$190.00	2005 October Monthly
W. Carey	9/15/2005	\$190.00	2005 October Monthly
W. Carey	9/29/2005	\$190.00	2005 October Monthly
W. Carey	10/13/2005	\$190.00	2005 November Monthly
W. Carey	10/27/2005	\$190.00	2005 November Monthly
W. Carey	11/10/2005	\$190.00	2005 December Monthly
W. Carey	11/23/2005	\$190.00	2005 December Monthly
W. Carey	12/8/2005	\$190.00	2005 Year End
W. Carey	12/22/2005	\$190.00	2005 Year End
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Thomas M. Culligan	1/14/2005	\$384.60	2005 February Monthly
Thomas M. Culligan	2/11/2005	\$384.60	2005 March Monthly
Thomas Culligan	3/10/2005	\$384.60	2005 April Monthly
Thomas Culligan	4/10/2005	\$576.90	2005 May Monthly
Thomas Culligan	4/30/2005	\$384.60	2005 May Monthly
Thomas Culligan	5/12/2005	\$192.30	2005 June Monthly
Thomas Culligan	5/26/2005	\$192.30	2005 June Monthly
Thomas Culling			2005 Juile Monainy
Thomas Culligan	6/9/2005	\$192.30	2005 July Monthly
Thomas Culligan Thomas Culligan	6/9/2005 6/23/2005	\$192.30 \$192.30	 : : : : : : : _
	_ _		2005 July Monthly
Thomas Culligan	6/23/2005	\$192.30	2005 July Monthly 2005 July Monthly
Thomas Culligan Thomas Culligan	6/23/2005 7/7/2005	\$192.30 \$192.30	2005 July Monthly 2005 July Monthly 2005 August Monthly
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Thomas Culligan Thomas Culligan Thomas Culligan Thomas Culligan	6/23/2005 7/7/2005 7/21/2005 8/4/2005 8/18/2005 9/1/2005	\$192.30 \$192.30 \$192.30 \$192.30	2005 July Monthly 2005 August Monthly 2005 August Monthly 2005 August Monthly 2005 September Monthly 2005 September Monthly 2005 October Monthly
Thomas Culligan	6/23/2005 7/7/2005 7/21/2005 8/4/2005 8/18/2005	\$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30	2005 July Monthly 2005 July Monthly 2005 August Monthly 2005 August Monthly 2005 September Monthly 2005 September Monthly 2005 October Monthly 2005 October Monthly
Thomas Culligan	6/23/2005 7/7/2005 7/21/2005 8/4/2005 8/18/2005 9/1/2005	\$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30	2005 July Monthly 2005 August Monthly 2005 August Monthly 2005 September Monthly 2005 September Monthly 2005 October Monthly 2005 October Monthly 2005 October Monthly
Thomas Culligan	6/23/2005 7/7/2005 7/21/2005 8/4/2005 8/18/2005 9/1/2005 9/15/2005	\$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30	2005 July Monthly 2005 August Monthly 2005 August Monthly 2005 September Monthly 2005 September Monthly 2005 October Monthly 2005 October Monthly 2005 October Monthly 2005 October Monthly 2005 November Monthly
Thomas Culligan	6/23/2005 7/7/2005 7/21/2005 8/4/2005 8/18/2005 9/1/2005 9/15/2005 9/29/2005	\$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30	2005 July Monthly 2005 August Monthly 2005 August Monthly 2005 September Monthly 2005 September Monthly 2005 October Monthly 2005 October Monthly 2005 October Monthly 2005 October Monthly 2005 November Monthly 2005 November Monthly
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Thomas Culligan	6/23/2005 7/7/2005 7/21/2005 8/4/2005 8/18/2005 9/1/2005 9/15/2005 9/29/2005 10/13/2005 10/27/2005	\$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30	2005 July Monthly 2005 August Monthly 2005 August Monthly 2005 September Monthly 2005 September Monthly 2005 October Monthly 2005 October Monthly 2005 October Monthly 2005 October Monthly 2005 November Monthly 2005 November Monthly
Thomas Culligan	6/23/2005 7/7/2005 7/21/2005 8/4/2005 8/18/2005 9/1/2005 9/15/2005 9/29/2005 10/13/2005 10/27/2005 11/10/2005	\$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30 \$192.30	2005 July Monthly 2005 August Monthly 2005 August Monthly 2005 September Monthly 2005 September Monthly 2005 October Monthly 2005 October Monthly 2005 October Monthly 2005 October Monthly 2005 November Monthly 2005 November Monthly 2005 December Monthly

Contributor Name	Date	Amount	Report
Charles E. Franklin	1/14/2005	\$384.00	2005 February Monthly
Charles E. Franklin	2/11/2005	\$384.00	2005 March Monthly
Charles Franklin	3/10/2005	\$384.00	2005 April Monthly
Charles Franklin	4/10/2005	\$576.00	2005 May Monthly
Charles Franklin	4/30/2005	\$384.00	2005 May Monthly
Charles Franklin	5/12/2005	\$192.00	2005 June Monthly
Charles Franklin	5/26/2005	\$192.00	2005 June Monthly
Charles Franklin	6/9/2005	\$192.00	2005 July Monthly
Charles Franklin	6/23/2005	\$192.00	2005 July Monthly
Charles Franklin	7/7/2005	\$192.00	2005 August Monthly
Charles Franklin	7/21/2005	\$192.00	2005 August Monthly
Charles Franklin	8/4/2005	\$192.00	2005 September Monthly
Charles Franklin	8/18/2005	\$192.00	2005 September Monthly
Charles Franklin	9/1/2005	\$192.00	2005 October Monthly
Charles Franklin	9/15/2005	\$192.00	2005 October Monthly
Charles Franklin	9/29/2005	\$192.00	2005 October Monthly
Charles Franklin	10/13/2005	\$192.00	2005 November Monthly
Charles Franklin	10/27/2005	\$192.00	2005 November Monthly
Charles Franklin	11/10/2005	\$192.00	2005 December Monthly
Charles Franklin	11/23/2005	\$192.00	2005 December Monthly
Charles Franklin	12/8/2005	\$192.00	2005 Year End
Charles Franklin	12/22/2005	\$192.00	2005 Year End
Jack R. Kelble	1/14/2005	\$382.00	2005 February Monthly
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∣ Jack R. Kelble	2/11/2005	\$382.00	2005 March Monthly
Jack R. Kelble Jack Kelble	2/11/2005 3/10/2005	\$382.00 \$191.00	2005 March Monthly 2005 April Monthly
Jack Kelble	3/10/2005	\$191.00	2005 April Monthly
	3/10/2005 3/10/2005	\$191.00 \$191.00	2005 April Monthly 2005 April Monthly
Jack Kelble Jack Kelble	3/10/2005	\$191.00 \$191.00 \$382.00	2005 April Monthly 2005 April Monthly 2005 May Monthly
Jack Kelble Jack Kelble Jack Kelble	3/10/2005 3/10/2005 4/10/2005 4/30/2005	\$191.00 \$191.00 \$382.00 \$573.00	2005 April Monthly 2005 April Monthly 2005 May Monthly 2005 June Monthly
Jack Kelble Jack Kelble Jack Kelble Jack Kelble	3/10/2005 3/10/2005 4/10/2005	\$191.00 \$191.00 \$382.00 \$573.00 \$191.00	2005 April Monthly 2005 April Monthly 2005 May Monthly 2005 June Monthly 2005 June Monthly
Jack Kelble Jack Kelble Jack Kelble Jack Kelble Jack Kelble Jack Kelble	3/10/2005 3/10/2005 4/10/2005 4/30/2005 5/13/2005	\$191.00 \$191.00 \$382.00 \$573.00	2005 April Monthly 2005 April Monthly 2005 May Monthly 2005 June Monthly 2005 June Monthly 2005 June Monthly 2005 July Monthly
Jack Kelble	3/10/2005 3/10/2005 4/10/2005 4/30/2005 5/13/2005 5/27/2005	\$191.00 \$191.00 \$382.00 \$573.00 \$191.00	2005 April Monthly 2005 April Monthly 2005 May Monthly 2005 June Monthly 2005 June Monthly 2005 July Monthly 2005 July Monthly
Jack Kelble	3/10/2005 3/10/2005 4/10/2005 4/30/2005 5/13/2005 5/27/2005 6/10/2005	\$191.00 \$191.00 \$382.00 \$573.00 \$191.00 \$191.00	2005 April Monthly 2005 April Monthly 2005 May Monthly 2005 June Monthly 2005 June Monthly 2005 July Monthly 2005 July Monthly 2005 July Monthly 2005 August Monthly
Jack Kelble	3/10/2005 3/10/2005 4/10/2005 4/30/2005 5/13/2005 5/27/2005 6/10/2005 6/24/2005	\$191.00 \$191.00 \$382.00 \$573.00 \$191.00 \$191.00 \$191.00	2005 April Monthly 2005 April Monthly 2005 May Monthly 2005 June Monthly 2005 June Monthly 2005 July Monthly 2005 July Monthly 2005 August Monthly 2005 August Monthly
Jack Kelble	3/10/2005 3/10/2005 4/10/2005 4/30/2005 5/13/2005 5/27/2005 6/10/2005 6/24/2005 7/8/2005	\$191.00 \$191.00 \$382.00 \$573.00 \$191.00 \$191.00 \$191.00 \$191.00	2005 April Monthly 2005 April Monthly 2005 May Monthly 2005 June Monthly 2005 June Monthly 2005 July Monthly 2005 July Monthly 2005 August Monthly 2005 August Monthly 2005 September Monthly
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Jack Kelble	3/10/2005 3/10/2005 4/10/2005 4/30/2005 5/13/2005 5/27/2005 6/10/2005 6/24/2005 7/8/2005 7/22/2005 8/5/2005	\$191.00 \$191.00 \$382.00 \$573.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00	2005 April Monthly 2005 April Monthly 2005 May Monthly 2005 June Monthly 2005 June Monthly 2005 July Monthly 2005 July Monthly 2005 August Monthly 2005 August Monthly 2005 September Monthly 2005 September Monthly
Jack Kelble	3/10/2005 3/10/2005 4/10/2005 4/30/2005 5/13/2005 5/27/2005 6/10/2005 6/24/2005 7/8/2005 7/22/2005 8/5/2005	\$191.00 \$191.00 \$382.00 \$573.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00	2005 April Monthly 2005 April Monthly 2005 May Monthly 2005 June Monthly 2005 June Monthly 2005 July Monthly 2005 July Monthly 2005 August Monthly 2005 August Monthly 2005 September Monthly 2005 September Monthly 2005 October Monthly
Jack Kelble	3/10/2005 3/10/2005 4/10/2005 4/30/2005 5/13/2005 5/27/2005 6/10/2005 6/24/2005 7/8/2005 7/22/2005 8/5/2005 8/19/2005 9/2/2005	\$191.00 \$191.00 \$382.00 \$573.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00	2005 April Monthly 2005 April Monthly 2005 May Monthly 2005 June Monthly 2005 June Monthly 2005 July Monthly 2005 July Monthly 2005 August Monthly 2005 August Monthly 2005 September Monthly 2005 September Monthly 2005 October Monthly 2005 October Monthly
Jack Kelble	3/10/2005 3/10/2005 4/10/2005 4/30/2005 5/13/2005 5/27/2005 6/10/2005 6/24/2005 7/8/2005 7/22/2005 8/5/2005 8/19/2005 9/2/2005 9/16/2005	\$191.00 \$191.00 \$382.00 \$573.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00	2005 April Monthly 2005 April Monthly 2005 May Monthly 2005 June Monthly 2005 June Monthly 2005 July Monthly 2005 July Monthly 2005 August Monthly 2005 August Monthly 2005 September Monthly 2005 September Monthly 2005 October Monthly 2005 October Monthly 2005 October Monthly
Jack Kelble	3/10/2005 3/10/2005 4/10/2005 4/30/2005 5/13/2005 5/27/2005 6/10/2005 6/24/2005 7/8/2005 7/22/2005 8/5/2005 8/19/2005 9/2/2005 9/16/2005 9/30/2005	\$191.00 \$191.00 \$382.00 \$573.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00	2005 April Monthly 2005 April Monthly 2005 May Monthly 2005 June Monthly 2005 June Monthly 2005 July Monthly 2005 July Monthly 2005 August Monthly 2005 August Monthly 2005 September Monthly 2005 September Monthly 2005 October Monthly
Jack Kelble	3/10/2005 3/10/2005 4/10/2005 4/30/2005 5/13/2005 5/27/2005 6/10/2005 6/24/2005 7/8/2005 7/22/2005 8/5/2005 8/19/2005 9/2/2005 9/16/2005 9/30/2005 10/14/2005	\$191.00 \$191.00 \$382.00 \$573.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00	2005 April Monthly 2005 April Monthly 2005 May Monthly 2005 June Monthly 2005 June Monthly 2005 July Monthly 2005 July Monthly 2005 August Monthly 2005 August Monthly 2005 September Monthly 2005 September Monthly 2005 October Monthly
Jack Kelble	3/10/2005 3/10/2005 4/10/2005 4/30/2005 5/13/2005 5/27/2005 6/10/2005 6/24/2005 7/8/2005 7/22/2005 8/5/2005 8/19/2005 9/2/2005 9/16/2005 9/30/2005 10/14/2005 10/28/2005	\$191.00 \$191.00 \$382.00 \$573.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00	2005 April Monthly 2005 April Monthly 2005 May Monthly 2005 June Monthly 2005 June Monthly 2005 July Monthly 2005 July Monthly 2005 August Monthly 2005 August Monthly 2005 September Monthly 2005 September Monthly 2005 October Monthly 2005 November Monthly
Jack Kelble	3/10/2005 3/10/2005 4/10/2005 4/30/2005 5/13/2005 5/27/2005 6/10/2005 6/24/2005 7/8/2005 7/8/2005 8/5/2005 8/19/2005 9/2/2005 9/16/2005 9/30/2005 10/14/2005 10/28/2005 11/10/2005	\$191.00 \$382.00 \$573.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00 \$191.00	2005 April Monthly 2005 April Monthly 2005 May Monthly 2005 June Monthly 2005 June Monthly 2005 July Monthly 2005 July Monthly 2005 August Monthly 2005 August Monthly 2005 September Monthly 2005 September Monthly 2005 October Monthly 2005 November Monthly 2005 November Monthly 2005 November Monthly

Contributor Name	Date	Amount	Report
William James Lynn	1/14/2005	\$384.60	2005 February Monthly
William James Lynn	2/11/2005	\$384.60	2005 March Monthly
William Lynn	3/10/2005	\$384.60	2005 April Monthly
William Lynn	4/10/2005	\$576.90	2005 May Monthly
William Lynn	4/30/2005	\$384.60	2005 May Monthly
William Lynn	5/12/2005	\$192.30	2005 June Monthly
William Lynn	5/26/2005	\$192.30	2005 June Monthly
William Lynn	6/9/2005	\$192.30	2005 July Monthly
William Lynn	6/23/2005	\$192.30	2005 July Monthly
William Lynn	7/7/2005	\$192.30	2005 August Monthly
William Lynn	7/21/2005	\$192.30	2005 August Monthly
William Lynn	8/4/2005	\$192.30	2005 September Monthly
William Lynn	8/18/2005	\$192.30	2005 September Monthly
William Lynn	9/1/2005	\$192.30	2005 October Monthly
William Lynn	9/15/2005	\$192.30	2005 October Monthly
William Lynn	9/29/2005	\$192.30	2005 October Monthly
William Lynn	10/13/2005	\$192.30	2005 November Monthly
William Lynn	10/27/2005	\$192.30	2005 November Monthly
William Lynn	11/10/2005	\$192.30	2005 December Monthly
William Lynn	11/23/2005	\$192.30	2005 December Monthly
William Lynn	12/8/2005	\$192.30	2005 Year End
William Lynn	12/22/2005	\$192.30	2005 Year End
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William H. Swanson	1/14/2005	\$384.60	2005 February Monthly
William H. Swanson	2/11/2005	\$384.60	2005 March Monthly
William Swanson	3/10/2005	\$384.60	2005 April Monthly
William Swanson	4/10/2005	\$576.90	2005 May Monthly
William Swanson	4/30/2005	\$384.60	2005 May Monthly
William Swanson	5/12/2005	\$192.30	2005 June Monthly
William Swanson	5/26/2005	\$192.30	2005 June Monthly
William Swanson	6/9/2005	\$192.30	2005 July Monthly
William Swanson	6/23/2005	\$192.30	2005 July Monthly
William Swanson	7/7/2005	\$192.30	2005 August Monthly
William Swanson	7/21/2005	\$192.30	2005 August Monthly
William Swanson	8/4/2005	\$192.30	2005 September Monthly
William Swanson	8/18/2005	\$192.30	2005 September Monthly
William Swanson	9/1/2005	\$192.30	2005 October Monthly
William Swanson	9/15/2005	\$192.30	2005 October Monthly
William Swanson	9/29/2005	\$192.30	2005 October Monthly
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William Swanson	12/22/2005	\$192.30	2005 Year End